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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

EDYTA GRYGLAK, formerly known as  
EDYTA A. FROMKIN,

Plaintiff,

vs.

HSBC BANK USA, N.A., as trustee for  
WELLS FARGO HOME EQUITY ASSET-  
BACKED CERTIFICATES, Series 2006-3,  
by its Attorney-in-fact WELLS FARGO  
BANK, N.A.; WELLS FARGO BANK,  
N.A.; and WELLS FARGO ASSET  
SECURITIES CORPORATION,

Defendants.

Case No.: 2:17-cv-01514-JCM-NJK

**STIPULATION AND ORDER TO  
EXTEND BRIEFING SCHEDULE  
ON DEFENDANTS' RENEWED  
MOTION FOR SUMMARY JUDGMENT  
(SECOND REQUEST)**

Defendants HSBC Bank USA, N.A., as trustee for Wells Fargo Home Equity Asset-Backed Certificates, Series 2006-3, by its Attorney-in-fact Wells Fargo Bank, N.A., Wells Fargo Bank, N.A., and Wells Fargo Asset Securities Corporation (collectively, "Defendants" or "Wells Fargo") and Plaintiff Edyta Gryglak ("Plaintiff" and together with Defendants, the "Parties") hereby stipulate to extend by two days the time for Plaintiff to respond to for Defendants' Renewed Motion for Summary Judgment [ECF 151] (the "Renewed Summary Judgment Motion") from July 6, 2021 to July 8, 2021, and to extend the remaining dates of the briefing schedule by two days.

WHEREAS on May 28, 2021, Wells Fargo filed the Renewed Summary Judgment Motion pursuant to the May 24, 2021 Stipulation and Order [ECF 150], which granted Wells Fargo's Motion to Reopen the Dispositive Motion Deadline;

WHEREAS the May 24, 2021 Stipulation and Order provided that “Ms. Gryglak shall have 30 days from the date that Wells Fargo files its renewed summary judgment motion to (1) file an opposition to that motion and (2) file her own optional summary judgment motion regarding her theory of contract damages, only” (the “Gryglak Summary Judgment Motion”);

WHEREAS the July 1, 2021 Stipulation and Order [ECF 153] extended the due date to file the Gryglak Summary Judgment Motion and Ms. Gryglak’s papers in opposition to Wells Fargo’s Renewed Summary Judgment Motion by one week, to July 6, 2021, and set other dates as a unified briefing schedule for both summary judgment motions;

WHEREAS Ms. Gryglak’s lead counsel is almost ready to file the Gryglak Summary Judgment Motion and her papers in opposition to Wells Fargo’s Renewed Summary Judgment Motion, but he needs two additional days to do so due to unexpected developments in one of his other litigation matters involving proceedings in Romania, Portugal and France;

**THE PARTIES HEREBY STIPULATE:**

1. Ms. Gryglak’s due date to file the Gryglak Summary Judgment Motion and her papers in opposition to Wells Fargo’s Renewed Summary Judgment Motion is extended by two days, from July 6, 2021 to July 8, 2021.

2. The remainder of the briefing schedule for Wells Fargo’s Renewed Summary Judgment Motion and the Gryglak Summary Judgment Motion shall be extended by two days:

- (i) The due date for Wells Fargo’s opposition to the Gryglak Summary Judgment Motion and reply in further support of its Summary Judgment Motion is extended from August 6 to August 9, 2021;
- (ii) The due date for Ms. Gryglak’s reply in further support of her Motion is extended from August 20 to August 23, 2021.

Dated: July 6, 2021

Dated: July 6, 2021

SNELL & WILMER L.L.P.

THE GRIFFITH FIRM

*/s/ Kelly H. Dove*

*/s/ Edward Griffith*

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*Attorneys for Defendants*

*Attorney for Plaintiff*

**ORDER**

**IT IS HEREBY ORDERED** that the due date for Ms. Gryglak to file her summary judgment motion regarding her theory of contract damages, only (the “Gryglak Summary Judgment Motion”) and her papers in opposition to Wells Fargo’s Renewed Motion for Summary Judgment is extended by two days, from July 6, 2021 to July 8, 2021.

**IT IS HEREBY FURTHER ORDERED** that the remainder of the briefing schedule for Wells Fargo’s Renewed Motion for Summary Judgment and the Gryglak Summary Judgment Motion shall be extended by two days as follows:

- (i) The due date for Wells Fargo’s opposition to the Gryglak Summary Judgment Motion and reply papers in further support of its Renewed Summary Judgment Motion is extended from August 6, 2021 to August 9, 2021;
- (ii) The due date for Ms. Gryglak’s reply papers in further support of the Gryglak Summary Judgment Motion is extended from August 20, 2021 to August 23, 2021.

**IT IS SO ORDERED.**

DATED July 7, 2021.

  
U.S. DISTRICT COURT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on July 6, 2021, I electronically filed the foregoing **STIPULATION** with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED this 6<sup>th</sup> day of July 2021.

*/s/ Edward Griffith*

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EDWARD GRIFFITH, ESQ

4826-2272-1265